

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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	:	Civil Action
IN RE SONUS NETWORKS, INC. LITIGATION	:	No. 04-10294-DPW
	:	<b>ORAL ARGUMENT</b>
-----	x	<b>REQUESTED</b>

**DEFENDANT STEPHEN J. NILL'S MOTION TO DISMISS**

Pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6) and the Private Securities Litigation Reform Act of 1995, Defendant Stephen J. Nill ("Mr. Nill") hereby moves this Court to dismiss the First Amended Consolidated Class Action Complaint with prejudice and without leave to further amend. The grounds for Mr. Nill's Motion to Dismiss are set forth in the accompanying memorandum of law.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(D), Mr. Nill hereby respectfully requests oral argument on this motion.

Dated: September 12, 2005  
Boston, Massachusetts

Respectfully submitted,

/s/ Matthew J. Matule  
Thomas J. Dougherty (BBO #132300)  
Matthew J. Matule (BBO #632075)  
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Counsel for Defendant  
Stephen J. Nill

**LOCAL RULE 7.1 CERTIFICATION**

I, Matthew J. Matule, hereby certify that counsel for the Lead Plaintiff is expecting this motion based upon the colloquy at the June 1, 2005 hearing and briefing schedule established by the Court at that hearing.

Dated: September 12, 2005

/s/ Matthew J. Matule  
Matthew J. Matule